

Hi Julie,

As I mentioned to you at the MWELo public meeting at MWD headquarters, we have a number of concerns about the new draft language, but one perked our interest the most. It's the inserted language below re. Landscape Designers being able to prepare irrigation plans, that is, at least the way we interpret this.

I went up onto the California Law – California Business and Professions Code website and copied all the referenced sections cited to support the Landscape Designers are enabled to design irrigation system, which as we see it, is an incorrect interpretation of the code sections cited.

*Model Water Efficient Landscape Ordinance, June 12, 2015 (Working Draft presented to ITP)*

**On Page 5:**

(hh) “landscape designer” means a person permitted by the Business and Profession Code to prepare plans, drawings, and specifications for the selection, placement, or use of plants for single family dwellings. They may prepare drawings for the conceptual design and placement of tangible objects and landscape

features. A landscape designer may not prepare construction documents, details, or specifications for tangible landscape objects or landscape features or prepare grading and drainage plans for the alteration of sites.

**On Page 15:**

(13) bear the signature of a licensed landscape architect, licensed landscape contractor, landscape designer or any other person authorized to design a landscape. (See Sections 5500.1, 5615, 5641, 5641.1, 5641.2, 5641.3, 5641.4, 5641.5, 5641.6, 6701, 7027.5 of the Business and Professions Code, Section 832.27 of Title 16 of the California Code of Regulations, and Section 6721 of the Food and Agriculture Code.)

Note: Authority Cited: Section 65595, Government Code. Reference: Section 65596, Government Code and Section 1351, Civil Code.

I was not aware that a landscape designer could design and or had a stamp or is authorized sign off on an irrigation design, again that how the language appears to read.

**Our suggestion is that the following needs to be inserted into the MELO. (at the very least).**

**Please state that "unlicensed designers are not allowed to prepare nor submit construction documents, details or specifications (Planting/Irrigation/Grading and Drainage)".**

Thank you,

mark Susser  
Landscape Architect, CA # 5809